

**FILED**

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA

MAR 10 2020

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

HURLEY DEWAYNE PITTS,

*Defendant.*

By PATRICK KEANEY  
Clerk, U.S. District Court  
Deputy Clerk

Case No. CR 20-011-RAW

**SUPERSEDING**  
**INDICTMENT**

The Federal Grand Jury charges:

**COUNT ONE**

**FELON IN POSSESSION OF FIREARM & AMMUNITION**  
**[18 U.S.C. §§ 922(g)(1), 924(a)(2) & 924(e)(1)]**

On or about January 18, 2020, within the Eastern District of Oklahoma, the defendant, **HURLEY DEWAYNE PITTS**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of said conviction, did knowingly possess in and affecting commerce, the following firearm and ammunition, to-wit:

- one (1) Smith and Wesson, Model M&P 40 Shield, .40 S&W caliber, semi-automatic pistol, Serial Number HTE6497; and
- eight (8) rounds of Tulammo brand .40 S&W caliber ammunition,

which had been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 924(e)(1).

**COUNT TWO**

**INFLUENCING FEDERAL OFFICIAL BY THREATENING FAMILY MEMBER  
[18 U.S.C. §§ 115(a)(1)(A) & 115(b)(4)]**

On or about February 22, 2020, within the Eastern District of Oklahoma, the defendant, **HURLEY DEWAYNE PITTS**, did threaten to assault, kidnap, and murder a member of the immediate family of T.C., a Task Force Officer for the Federal Bureau of Investigation, with intent to impede, intimidate, and interfere with T.C. while he was engaged in the performance of his official duties and to retaliate against T.C. on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(A) and 115(b)(4).

**FORFEITURE ALLEGATION  
[18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)]**

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Count One this Indictment involving violations of Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 924(e)(1), the defendant, **HURLEY DEWAYNE PITTS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including, but not limited to:

- one (1) Smith and Wesson, Model M&P 40 Shield, .40 S&W caliber, semi-automatic pistol, Serial Number HTE6497; and
- eight (8) rounds of Tulammo brand .40 S&W caliber ammunition.

A TRUE BILL:

BRIAN J. KUESTER  
United States Attorney

  
CLAY A. COMPTON, OBA # 19781  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
FOREPERSON OF THE GRAND JURY